

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1) LOUIS MELVIN WILLIAMSON,
[DOB: 6/24/1971]

2) KURT THOMAS KINGSLEY,
[DOB: 7/16/1982]

and

3) KENNETH JAMES PAULSON,
[DOB: 1/5/1971]

Defendants.

No. _____

COUNT ONE: (All Defendants)

*Conspiracy to Distribute 500 Grams or More of
Methamphetamine*

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846
NLT: 10 Years' Imprisonment
NMT: Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years' Supervised Release
Class A Felony

COUNTS TWO and THREE: (Paulson)

*Distribution of 50 Grams or More of
Methamphetamine (actual)*

21 U.S.C. §§ 841(a)(1), (b)(1)(A)
NLT: 10 Years' Imprisonment
NMT: Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years' Supervised Release
Class A Felony

COUNT FOUR: (Paulson)

*Possession with Intent to Distribute 50 Grams or More
of Methamphetamine (actual)*

21 U.S.C. §§ 841(a)(1), (b)(1)(A)
NLT: 10 Years' Imprisonment
NMT: Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years' Supervised Release
Class A Felony

COUNT FIVE: (Kingsley)

*Possession with Intent to Distribute 5 Grams or More
of Methamphetamine (actual)*

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
NLT: 5 Years' Imprisonment
NMT: 40 Years' Imprisonment
NMT: \$5,000,000 Fine
NLT: 4 Years' Supervised Release
Class B Felony

Plus a \$100 Special Assessment for each Count

ALLEGATION OF CRIMINAL
FORFEITURE 21 U.S.C. § 853

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	Louis Melvin Williamson	1
2	Kurt Thomas Kingsley	1, 5
3	James Paulson	1, 2, 3, 4

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
Conspiracy to Distribute 500 Grams or More of Methamphetamine

Beginning on an unknown date, but no later than on or about August 11, 2020, and continuing to at least October 14, 2020, in Jackson County, in the Western District of Missouri and elsewhere, the defendants, LOUIS MELVIN WILLIAMSON, KURT THOMAS KINGSLEY and KENNETH JAMES PAULSON, and other persons known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

COUNT TWO
Distribution of 50 Grams or More of Methamphetamine (actual)

On or about August 11, 2020, in Jackson County, in the Western District of Missouri, the defendant, KENNETH JAMES PAULSON, did knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT THREE
Distribution of 50 Grams or More of Methamphetamine (actual)

On or about August 19, 2020, in Jackson County, in the Western District of Missouri, the defendant, KENNETH JAMES PAULSON, did knowingly and intentionally distribute 50 grams

or more of methamphetamine (actual), a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FOUR

Possession with Intent to Distribute 50 Grams or More of Methamphetamine (actual)

On or about October 13, 2020, in Jackson County, in the Western District of Missouri, the defendant, KENNETH JAMES PAULSON, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FIVE

Possession with Intent to Distribute 5 Grams or More of Methamphetamine (actual)

On or about October 14, 2020, in Jackson County, in the Western District of Missouri, the defendant, KURT THOMAS KINGSLEY, did knowingly and intentionally possess with the intent to distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the controlled substance offense alleged in Count One of this Indictment, LOUIS MELVIN WILLIAMSON, KURT THOMAS KINGSLEY and KENNETH JAMES PAULSON, the defendants, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count One of this Indictment, including, but not limited to the following:

A money judgement representing all proceeds the defendant obtained directly and indirectly as a result of his or her participation in the drug conspiracy alleged in Count One of this Indictment.

Substitute Assets

3. If any of the property described above, as a result of any act or omission of the defendant:

- 3.1. cannot be located upon the exercise of due diligence;
- 3.2. has been transferred or sold to, or deposited with, a third party;
- 3.3. has been placed beyond the jurisdiction of the Court;
- 3.4. has been substantially diminished in value; or
- 3.5. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a)
Federal Rules of Criminal Procedure.

A TRUE BILL.

4/30/2021
DATE

/s/ Kathleen Shaw
FOREPERSON OF THE GRAND JURY

/s/ Brandon E. Gibson
Brandon E. Gibson
Special Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri